



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

100 CHURCH STREET  
NEW YORK, NY 10007

SHARON SPRAYREGEN  
phone: (212) 356-0873  
email: ssprayre@law.nyc.gov  
(not for service)

April 28, 2022

**BY ECF**

Hon. Gabriel W. Gorenstein  
United States District Judge  
Southern District of New York  
500 Pearl St  
New York, New York 10007

**MEMORANDUM ENDORSED**

Re: L.R. obo J.Q. v. N.Y. City Dep't of Educ., et al.  
19 CV 577 (LGS) (GWG)

Dear Judge Gorenstein,

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, counsel for Defendants in the above action. I write jointly with Plaintiffs' counsel to request a 40-day stay of discovery, until June 7, 2022. Pursuant to the Court's Order (ECF No. 51), discovery is presently set to close on Monday May 2, 2022.

The parties have reached an agreement on *all* issues in the action with the exception of attorney's fees (previously the parties had not agreed on rates to be paid for education services; the parties have now resolved that significant issue). The parties are also close to finalizing a stipulation of settlement. Defendants will commit to submitting a request for settlement authority to the Office of the Comptroller by May 5, 2022, a week from today—and offer to submit a status report to the Court on or before May 5 apprising the Court that the request for authority has been submitted. Though the parties have previously requested one prior extension of discovery for purposes of facilitating settlement; this is the first request to stay discovery.<sup>1</sup> My Office and Plaintiffs' counsel regularly settle cases together and have never had a settlement fall apart over attorney's fees. Thus, the parties are extremely optimistic that we will be able to complete a settlement in this action.

---

<sup>1</sup> The Honorable Alison J. Nathan had scheduled a post-discovery conference for May 13, 2022. The action has recently been transferred to the Honorable Lorna G. Schofield, and the parties intend to write Judge Schofield requesting an adjournment of that conference.

In the unlikely event that the parties are unable to reach a full settlement including fees by May 31, 2022, the parties intend to jointly seek an extension of the close of discovery, and will submit a letter setting forth the grounds for the requested extension.<sup>2</sup>

Thank you for consideration of this request.

Respectfully,

/s/  
Sharon Sprayregen  
Assistant Corporation Counsel

cc: All counsel of record (by ECF)

All discovery in this matter is stayed through June 7, 2022. The parties shall report by that date as to the status of settlement.

So Ordered.

  
\_\_\_\_\_  
GABRIEL W. GREENSTEIN  
United States Magistrate Judge

April 29, 2022

---

<sup>2</sup> The parties have intentionally chosen a date one week before the requested end of the stay to give the parties time to make an application to extend the close of discovery.